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**UNITED STATES DISTRICT COURT**

## **NORTHERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA.

Case No.: 3:18-cr-00577-CRB

**Plaintiff,**

Judge: Hon. Charles Breyer

vs.

MICHAEL RICHARD LYNCH and  
STEPHEN KEITH CHAMBERLAIN

**DECLARATION OF JONATHAN M.  
BAUM IN SUPPORT OF DEFENDANT  
MICHAEL RICHARD LYNCH'S MOTION  
FOR ADMISSION OF FULL AUDIO  
RECORDING**

## Defendants.

Date Filed: May 19, 2024

## **DECLARATION OF JONATHAN M. BAUM**

I, Jonathan M. Baum, declare as follows:

1. I am an attorney licensed to practice law in California and a partner at the law firm of Steptoe LLP, counsel for the defendant Michael Richard Lynch. I am admitted to the United States District Court, Northern District of California.

2. I have knowledge of the facts set forth herein, and if called upon as a witness to testify thereto, I could do so competently under oath.

3. Attached hereto as Exhibit A is a true and correct copy of Exhibit 8598, the transcript associated with Exhibit 8257.

4. Attached hereto as Exhibit B is a true and correct copy of an excerpt of Exhibit 8598, the transcript associated with Exhibit 8257.2.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed May 19, 2024 in San Francisco, California.

Dated: May 19, 2024

Respectfully submitted,

/s/ Jonathan M. Baum

Jonathan M. Baum